

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:25-cv-22786-ELA

DINNTECO INTERNATIONAL, S.L., an
entity of Andorra la Vella,

Plaintiff,

v.

CAPITOL ELECTRONICS SALES, INC, an
Indiana corporation; EMP DEFENSE, LLC, a
Michigan limited liability company;
SEAHAWKE MARINE INC, a Florida
corporation; RIPPING IT OUTDOORS LLC,
a Florida limited liability company; and JAY
BHARAT KOTHARI d/b/a EMP Solutions,
an individual residing in the state of Florida,

Defendants.

**PLAINTIFF’S NOTICE OF SUPPLEMENTATION OF MOTION FOR EXTENSION OF
TIME TO RESPOND TO DEFENDANTS’ COMBINED MOTION TO DISMISS,
AND INCORPORATED MEMORANDUM OF LAW**

Plaintiff, Dinnteco International, S.L. (“Plaintiff”), by and through undersigned counsel, hereby supplements its Motion for Extension of Time to Respond to Defendants’ Combined Motion to Dismiss and Incorporated Memorandum of Law [D.E. 47], and states:

1. On Friday, September 19, 2025, Plaintiff served upon Defendants the following discovery requests, attached hereto as Exhibits “A” through “F”) (hereinafter, collectively, “Plaintiff’s Initial Discovery”):

- a. Plaintiff’s First Request for Production of Documents to Defendant, Capitol Electronics Sales, Inc. (Exhibit “A”),
- b. Plaintiff’s First Set of Interrogatories to Defendant, Capitol Electronics Sales, Inc. (Exhibit “B”),
- c. Plaintiff’s First Request for Production of Documents to Defendant, EMP

Defense, LLC (Exhibit “C”),

- d. Plaintiff’s First Set of Interrogatories to Defendant, EMP Defense, LLC (Exhibit “D”),
- e. Plaintiff’s First Request for Production of Documents to Defendant, Jay Bharat Kothari d/b/a EMP Solutions (Exhibit “E”), and
- f. Plaintiff’s First Set of Interrogatories to Defendant, Jay Bharat Kothari d/b/a EMP Solutions (Exhibit “F”).

2. Plaintiff’s Initial Discovery addresses Defendants’ argument that this Court lacks venue set forth in Defendants’ Combined Motion to Dismiss [D.E. 45].

3. Defendants’ responses to Plaintiff’s Initial Discovery are due October 20, 2025, and are necessary for Plaintiff to prepare its response to Defendants’ Combined Motion to Dismiss, particularly as pertains to Defendants’ venue arguments.

4. The 60-day extension of time to respond to Defendants’ Combined Motion to Dismiss requested by Plaintiff is therefore necessary to receive and analyze Defendants’ responses to Plaintiff’s Initial Discovery and, if necessary, schedule and take virtual depositions on issues relating to venue.

Conclusion

For the reasons set forth herein and in Plaintiff’s Motion for Extension of Time to Respond to Defendants’ Combined Motion to Dismiss and Incorporated Memorandum of Law [D.E. 47], Plaintiff requests a 60-day extension of time, through and including November 24, 2025, to respond to Defendants’ Combined Motion to Dismiss [D.E. 45].

Certificate of Conference

Pursuant to Local Rule 7.1(a)(3), undersigned counsel for Plaintiff certify they have conferred with counsel for Defendants, via Zoom conference on Monday, September 15, 2025, to obtain their position on Plaintiff's Motion for Extension of Time to Respond to Defendants' Combined Motion to Dismiss, and represent that Defendants oppose the relief requested herein.

Dated: September 23, 2025

/s/ Elio F. Martinez, Jr.

Elio F. Martinez, Jr.

Fla. Bar. No. 501158

elio.martinez@gray-robinson.com

GRAY | ROBINSON, P.A.

50 N. Laura Street

Sutie 1100

Jacksonville, Florida 32202

Tel: (904) 598-9929

Fax: (904) 598-9109

Francesca Russo

Fla. Bar. No. 174912

francesca.russo@gray-robinson.com

GRAY | ROBINSON, P.A.

333 S.E. 2nd Ave., Suite 3200

Miami, Florida 33131

Tel: (305) 416-6800

Fax: (305) 416-6887

Attorneys for Plaintiff

Dinnteco International, S.L.